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September 18, 2015

VIA EMAIL

The Honorable Debra Freeman
United States Magistrate Judge
United States Courthouse
500 Pearl St., Courtroom: 17A
New York, NY 10007-1312

Re: Marcial Flores v. Sky Bar Times Square Inc. d/b/a Sky Room & Bar, *et al.*
Case No. 1-15-cv-03387 (RJS)

Dear Judge Freeman:

This firm represents all of the defendants in the above-referenced action with the exception of newly-added defendants A-1 Contract Staffing, Inc. and Melvin Klinghoffer (which/who have not yet been served or appeared in this action). We write jointly with Plaintiff Marcial Flores ("Plaintiff") to request an adjournment of the October 1, 2015, 12 p.m. telephone conference with Your Honor in which the parties are to discuss a settlement conference. There has been no Order setting the call for this date, but the parties were notified of the conference via a telephone call from Your Honor's Chambers to Plaintiff's counsel.

We now request an adjournment of the October 1 call because a Second Amended Complaint was only just recently filed, adding multiple new defendants to the action, and because not all parties necessary for the call or a settlement conference will have appeared in the action by October 1. Indeed, my clients' deadline to respond to the new pleading is not until one day after the call (i.e., October 2, 2015), and A-1 and Mr. Klinghoffer will not have appeared as of October 1 either. Accordingly, a call to discuss a settlement conference on October 1 would be premature.

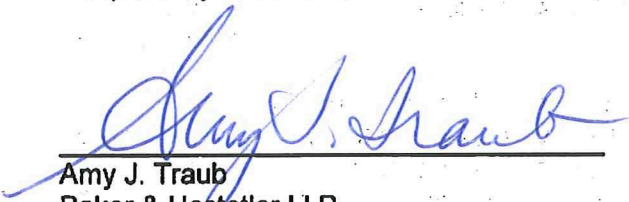
Accordingly, counsel for the undersigned respectfully request an adjournment of the October 1 call, as well as an extension of the September 30, 2015 deadline to contact Your Honor to schedule a settlement conference, until such time as all parties have appeared in the action and responded to the new pleading. This is the parties' first request for an adjournment/extension of this date/deadline.

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We thank the Court for its consideration of this request.

Respectfully submitted,



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